

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: D.I. 109**

**CERTIFICATION OF NO OBJECTION  
REGARDING “DEBTORS’ MOTION FOR ENTRY OF AN ORDER (A)  
AUTHORIZING, BUT NOT DIRECTING, THE DEBTORS TO EXTEND TIME TO  
FILE (I) SCHEDULES OF ASSETS AND LIABILITIES, (II) SCHEDULES OF  
CURRENT INCOME AND EXPENDITURES, (III) SCHEDULES OF EXECUTORY  
CONTRACTS AND UNEXPIRED LEASES, AND (IV) STATEMENTS OF FINANCIAL  
AFFAIRS AND (B) GRANTING OTHER RELATED RELIEF” [D.I. 109]**

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection, or any other responsive pleading to the *Debtors’ Motion for Entry of an Order (A) Authorizing, But Not Directing, the Debtors to Extend Time to File (I) Schedules of Assets and Liabilities, (II) Schedules of Current Income and Expenditures, (III) Schedules of Executory Contracts and Unexpired Leases, and (IV) Statements of Financial Affairs and (B) Granting Other Related Relief* [D.I. 109] (the “**Motion**”) filed by the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) on July 13, 2023.

The undersigned further certifies that he has reviewed the Court’s docket in these cases and no answer, objection, or other responsive pleading to the Motion appears thereon.

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Pursuant to the *Notice of Motion and Hearing* filed contemporaneously with the Motion, responses to the Motion were to be filed no later than 4:00 p.m. (Eastern Daylight Time) on July 20, 2023 (the “**Objection Deadline**”<sup>2</sup>). The Debtors therefore respectfully request that the proposed form of order attached hereto as **Exhibit A**, which is materially in the same form filed with the Motion, be entered at the earliest convenience of the Court.

*[Remainder of page intentionally left blank.]*

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<sup>2</sup> The Debtors agreed to extend the Objection Deadline for the Official Committee of Unsecured Creditors (the “**Creditors’ Committee**”) only until 11:00 a.m. (Eastern Daylight Time) on July 24, 2023. The Creditors’ Committee did not file an objection to the Motion by the Objection Deadline, as extended for it.

Dated: July 24, 2023

Respectfully submitted,

/s/ Jason M. Madron

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*Proposed Co-Counsel to Debtors and  
Debtors in Possession*

**Exhibit A**

**Proposed Order**

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Debtors.

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Case No. 23-10831 (MWF)

(Jointly Administered)

**Re: D.I. 109**

**ORDER (A) EXTENDING TIME TO FILE (I) SCHEDULES OF ASSETS  
AND LIABILITIES, (II) SCHEDULES OF CURRENT INCOME AND  
EXPENDITURES, (III) SCHEDULES OF EXECUTORY CONTRACTS AND  
UNEXPIRED LEASES, AND (IV) STATEMENTS OF FINANCIAL AFFAIRS  
AND (B) GRANTING OTHER RELATED RELIEF**

Upon the motion, dated July 13, 2023 [D.I. 109] (the “**Motion**”)<sup>2</sup> of the Debtors for entry of an order (this “**Order**”) (a) extending the time to file the Schedules and Statements; and (b) granting related relief, and the Court having found that it has jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference*, dated February 29, 2012 (Sleet, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due, sufficient, and proper notice of the Motion having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Rules, and it appearing that no other or further notice need be provided; and a hearing having been held, if necessary, to consider the

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<sup>2</sup> Capitalized terms used, but not otherwise defined, herein shall have the meanings ascribed to them in the Motion.

relief requested in the Motion (the “**Hearing**”); and the record of the Hearing, if any, and all other proceedings before this Court; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, their creditors, their stakeholders, and all other parties-in-interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. The time in which the Debtors shall file their Schedules and Statements is extended by an additional 7 days, beyond the 28 days extension provided by Local Rule 1007-1(b), to and through August 1, 2023.
3. The extension granted in paragraphs 2 of this Order is without prejudice to the Debtors’ right to seek additional extensions.
4. The Debtors are authorized and empowered to take and perform all actions necessary to implement and effectuate the relief granted in this Order.
5. Notwithstanding any Bankruptcy Rule or Local Rule to the contrary, this Order shall be effective immediately upon entry.
6. This Court retains jurisdiction with respect to all matters arising from or related to the enforcement of this Order.